

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

Docket No: 11 CR 1032/PAE

MIGUEL STRONG,

Defendant.

January 26, 2015

BY ECF

Hon. Paul A. Englemayer
United States District Court Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Miguel Strong, et. al., 11 CR 1032/PAE

Dear Honorable Court:

I am writing this letter to respectfully request an adjournment of the sentencing hearing for Mr. Miguel Strong which is currently scheduled for January 29, 2015 at 2:15pm. Counsel respectfully requests this Honorable Court to reschedule the sentencing hearing to any of the following dates, February 3rd, 6th, 26th - 28th or March 4th or 5th, or any date thereafter that is most convenient for the Court. Counsel also request that the Government be allowed to submit their sentencing submission one week before the date set by this Court for Mr. Strong's sentencing. I have spoken with the Assistant United States Attorney, Jessica Ortiz, regarding this request and the government consents to the requested adjournment.

Counsel respectfully makes this request because of the blizzard that is expected to last from Monday to Wednesday morning. Mr. Strong's family, as well as counsel, etc., may experience severe difficulty in travelling to the courthouse because of the snowstorm which is projected to deposit up to 18 inches of snow, possibly more, upon the tri-state area. This is Mr. Strong's second request for an adjournment.

Should the Court be inclined to grant the request, the parties submit that they are available to the Court at any time, on the above following dates.

Thank you for your consideration herein.

Respectfully Submitted,

/s/ Kafahni Nkrumah,

KAFAHNI NKRUMAH, Esq.

Counsel for Mr. Strong'

cc: (by ecf)

Ms. Jessica Ortiz

Assistant United States Attorney